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**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF MISSOURI
 DIVISION**

FILED

APR - 6 2018

**U.S. DISTRICT COURT
 EASTERN DISTRICT OF MO
 ST. LOUIS**

Mr. Lavon Gay
94297

(Enter above the full name of the
 Plaintiff in this action. Include prison
 registration number.)

v.

City of Saint Louis
ST. LOUIS METROPOLITAN POLICE
DEPT. ET AL (see ATTACH)
NO. 1

(Enter above the full name of ALL Defend-
 ant(s) in this action. Fed. R. Civ. P. 10(a)
 requires that the caption of the complaint
 include the names of **all** the parties. Merely
 listing one party and "et al." is insufficient.
 Please attach additional sheets if necessary.)

4:18CV529 NCC

Case No. _____
 (To be assigned by Clerk)

In what capacity are you suing the
 defendants?

- ☐ Official
☐ Individual
☒ Both

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

I. PLACE OF PRESENT CONFINEMENT:

200 S. Tucker Blvd. St. Louis Justice Center City St. Louis MO 63101

II. PREVIOUS CIVIL ACTIONS:

A. Have you brought any other civil actions in state or federal court dealing with the
 same facts involved in this action or otherwise relating to your confinement?

YES []

NO [✓]

①

Full name of Additional Defendants

- 1 Police Officer # 11271 Curtis Anthony Ford - 306
- 2 Police Officer # 11296 Andrew Michael Brown - 306
- 3 Police Officer # 11156 Timothy Nolan - 306
- 4 Police Officer # 8815 Ellis C Brown - 306
- 5
- 6

- B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff:

N/A

Defendant(s):

2. Court where filed:

3. Docket or case number:

N/A

4. Name of Judge:

5. Basic claim made:

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

N/A

III. GRIEVANCE PROCEDURES:

- A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES

☒

NO

☐

- B. Have you presented this grievance system the facts which are at issue in this complaint?

YES

☒

NO

☐

- C. If your answer to "B" is YES, what steps did you take: I went thru
the C.O.B Board, to file my complaint.
Civilian Oversight Board Department of Public Safety
- D. If your answer to "B" is NO, explain why you have not used the grievance system:

N/A

IV. PARTIES TO THIS ACTION:

A. Plaintiff

1. Name of Plaintiff: Mr. Lavon Gay
2. Plaintiff's address: 200 S. Tucker Blvd. St. Louis MO 63102
3. Registration number: 94297

B. Defendant(s)

1. Name of Defendant: City of Saint Louis, ST LOUIS METROPOLITAN POLICE
DEPT.
2. Defendant's address: CAN NOT OBTAIN
3. Defendant's employer and job title: ST-LOUIS POLICE DEPARTMENT
4. Additional Defendant(s) and address(es): City of Saint Louis
Missouri and State

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES []

NO [✓]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES []

NO [✓]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

N/A

D. If your answer to "B" is NO, explain why you have not made such efforts:

Do to no income also im incarcerated
Indigent

E. Have you previously been represented by counsel in a civil action in this Court?

YES []

NO [✓]

F. If your answer to "E" is YES, state the attorney's name and address:

N/A

- VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

On 9-26-2016 I Lavon Gay was arrested for 1st Degree Assault on a Law Enforcement Officer. The 6th District North Patrol Officers used excessive force in taking me in to custody. First, Officer Timothy Nolan DSN 11156 pointed his gun at me demanding I get on the ground. Secondly, He placed his handcuffs on me and yelled to the other assisting officers Andrew Brown DSN 11296, Curtis Ford DSN 11271 and Ellis Brown DSN 8815 "I got him." They came to where he detained me and began to speak to one another saying "He hurt one of our brothers he's got to pay for that. Before the rest of the Unit got there they began Assaulting me while on the ground in handcuffs. Thirdly the first kick came from Ellis Brown who stated "why did you make me run. He repeatedly kick me then then Timothy Nolan started kicking me saying "that was one of our brothers. NOTE: As they took turns kicking

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Continuous

me in the face and head they were looking out for the other assisting units to show up. Next, Curtis Ford began kicking me while I was on the ground in handcuffs. He kicked me in the face and head repeatedly. Finally, Andrew Brown who also took part in assaulting me by kicking me in the face and head. Once they all had brutality violated me the other responding units arrived they dragged me to the Sergeant Joseph Hill DSN 6437/1614 who then had me conveyed to Barnes Hospital for treatment. The retaliation in this incident has caused me permanent physical and psychological trauma.

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a **state** prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

Order the defendants to have my face reconstructed. Also appropriate medical treatment and medications. Finally, award me punitive monetary damages for undue pain and suffering, ~~the~~ and physical and psychological trauma.

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

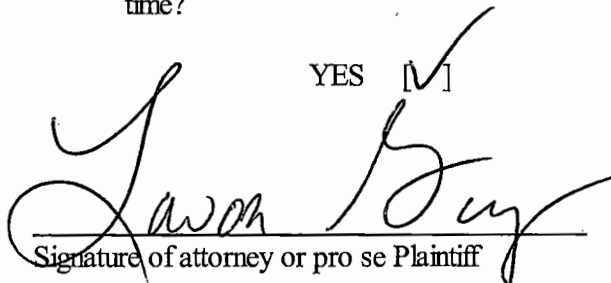
YES ☒ NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$ 5,000,000,000 5 million dollars for pain and suffering due to the deliberate brutality and due process violation.

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☒ NO ☐


Signature of attorney or pro se Plaintiff

3-20-2018
Date